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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Michael Daniels, } Case No. 4:24-cv-09445-HSG
Plaintiff, }
vs. }
Frank Bisignano, } STIPULATION AND ORDER
COMMISSIONER OF SOCIAL } FOR EXTENSION OF TIME
SECURITY¹, }
Defendant. }

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 3-day extension of time, from May 27, 2025 to

1 Frank Bisignano became the Acting Commissioner of Social Security on May 6, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 May 30, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S BRIEF. All
2 other dates in the Court's Scheduling Order shall be extended accordingly.

3 This is Plaintiff's second request for an extension of time. Plaintiff
4 respectfully states that the requested extension is necessary due several merit briefs
5 being due on the same week. For the week of May 26, 2025, Plaintiff's Counsel
6 has four merit briefs, one reply brief, and two EAJA Stipulations due. The case has
7 recently been assigned to Counsel. Counsel requires additional time to brief the
8 issues thoroughly for the Court's consideration. Defendant does not oppose the
9 requested extension. Counsel apologizes to the Defendant and Court for any
10 inconvenience this may cause.

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12 Respectfully submitted,

13 Dated: May 22, 2025 PENA & BROMBERG, ATTORNEYS AT LAW
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15 By: /s/ Dolly M. Trompeter
16 DOLLY M. TROMPETER
17 Attorneys for Plaintiff

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19 Dated: May 22, 2025 PATRICK D. ROBBINS
20 Acting United States Attorney
21 MATHEW W. PILE
22 Associate General Counsel
23 Office of Program Litigation
Social Security Administration

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25 By: */s/ Erin Highland
26 Erin Highland
27 Special Assistant United States Attorney
28 Attorneys for Defendant
(*As authorized by email on May 22, 2025)

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3 **ORDER**
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7 Pursuant to stipulation, IT IS SO ORDERED.
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10 Dated: 5/23/2025
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15 HON. HAYWOOD S. GILLIAM, JR.
16 UNITED STATES DISTRICT JUDGE
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